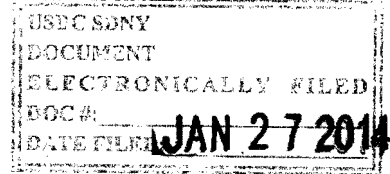


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA,

Plaintiff,

- v. -

ROSS WILLIAM ULBRICHT,
a/k/a "Dread Pirate Roberts,"
a/k/a "DPR,"
a/k/a "Silk Road,"

Defendant,

ANY AND ALL ASSETS OF SILK ROAD;

And All Property Traceable
Thereto, Including but not limited
to the BITCOINS LOCATED ON
ULBRICHT'S COMPUTER HARDWARE,

Defendants-in-rem.

STIPULATION AND ORDER
FOR INTERLOCUTORY
SALE OF BITCOINS

No. 13 Civ. 6919 (JPO)

ECF Case

WHEREAS, the United States of America ("Plaintiff"),
by and through its counsel, Preet Bharara, United States
Attorney for the Southern District of New York, of counsel
Christine I. Magdo, Assistant United States Attorney,
commenced the above-captioned action on or about September 30,
2013, upon the filing of a verified complaint (the
"Complaint"), seeking the forfeiture of the above-captioned
defendants in rem (the "Defendants in Rem") pursuant to Title
18, United States Code, Section 981(a)(1)(A), as property
involved in money laundering and attempted money laundering

transactions, in violation of Title 18, United States Code, Section 1956;

WHEREAS, on October 24, 2013, upon the application of the United States, the Court entered a protective order which, among other things, authorized the United States to seize any and all bitcoins contained in wallet files residing on certain computer hardware belonging to Ross William Ulbricht ("Ulbricht"), pending the outcome of this civil proceeding, by transferring the full account balance in each wallet to a Bitcoin address controlled by the United States (the "Computer Hardware Bitcoins");

WHEREAS, beginning on or about November 6, 2013, and continuing for 30 consecutive days thereafter, the United States of America published notice on www.forfeiture.gov of the seizure of the Computer Hardware Bitcoins;

WHEREAS, on or about November 8, 2013, the United States of America served notice upon Ulbricht, who is the only person or entity reasonably believed to be a potential claimant to the Computer Hardware Bitcoins, by certified mail, return receipt requested;

WHEREAS, on or about December 12, 2013, Ulbricht filed a timely verified claim in this proceeding, asserting an ownership interest in the Computer Hardware Bitcoins;

WHEREAS, no other individual or entity filed a verified claim for the Computer Hardware Bitcoins before the deadline to do so on January 6, 2014;

WHEREAS, the Government and Ulbricht agree that, due to the volatile market for bitcoins, the Computer Hardware Bitcoins risk losing value during the pendency of the forfeiture proceedings;

WHEREAS, the Government and Ulbricht agree that the Computer Hardware Bitcoins are to be liquidated or sold by the Government before the conclusion of the forfeiture proceedings, with the net proceeds of the sale to be held as substitute res pending further order of this Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED, ORDERED, AND AGREED THAT, PURSUANT TO RULE G(7)(b) OF THE SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS:

1. The United States and Ulbricht agree that the United States may, in its sole discretion, sell any portion or all of the Computer Hardware Bitcoins, on a date or dates and in a manner to be determined by the Government.

2. This Order does not obligate the Government to offer any of the Computer Hardware Bitcoins for sale.

3. Ulbricht represents that he is the sole owner of the Computer Hardware Bitcoins.

4. The net proceeds from the sale of the Computer

Hardware Bitcoins will include all moneys realized from the sale of the Computer Hardware Bitcoins except for any costs incurred by the Government in connection with the sale.

5. The cumulative net proceeds realized from any sale of all or any portion of the Computer Hardware Bitcoins, and any and all income or interest accrued thereon, shall be the substitute res for the Computer Hardware Bitcoins. The net proceeds shall be deposited and shall be held by the United States Marshals Service in the Seized Assets Deposit Fund pending further order of the Court.

6. Ulbricht represents that he has the sole authority to enter into this Stipulation regarding the Computer Hardware Bitcoins, and agrees to hold harmless the United States from any claims filed in this action by third parties alleging an interest in the Computer Hardware Bitcoins.

7. Each party agrees to bear its costs and attorneys' fees.

8. This Court shall retain jurisdiction in this matter to take additional action and enter further orders as necessary to implement and enforce this order authorizing the sale of the Computer Hardware Bitcoins.

9. The signature page of this stipulation may be

executed in one or more counterparts and transmitted by facsimile or electronic means. Each counterpart will be deemed an original, and all of them together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for Plaintiff

By:


CHRISTINE I. MAGDO

Assistant United States Attorney
One Saint Andrew's Plaza
New York, New York 10007

1/22/14

DATE

ROSS WILLIAM ULBRICHT

By:



JOSHUA L. DRATEL, ESQ.

Joshua L. Dratel, P.C.
29 Broadway, Suite 1412
New York, New York 10006

1/22/14

DATE

SO ORDERED:


HONORABLE J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK

Jan. 27, 2014

DATE